

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**ONE STOCKDUQ HOLDINGS, LLC,**

**Plaintiff,**

**V.**

**BECTON, DICKINSON AND COMPANY,**

**Defendant.**

**No. 2:12-cv-03037-JPM-tmp**

## JURY DEMAND

**JOINT MOTION FOR ENTRY OF A SCHEDULING ORDER**

Plaintiff One StockDuq Holdings, LLC (“One-SD”) and defendant Becton, Dickinson and Company (“BD”) jointly move this Court for entry of a scheduling order reflecting the deadlines discussed during the patent scheduling conference held by the Court on June 20, 2013.

One-SD and BD have consented to and propose for the Court's consideration the following schedule:

No.	Description	Deadline
1	Final Identification of Claim Terms to be Construed	June 28, 2013
2	Joining Parties	July 1, 2013
3	Amending Pleadings	July 1, 2013
4	Preliminary Claim Constructions and Supporting Materials	July 12, 2013
5	Parties to Hold Initial Meeting	July 22, 2013
6	Initial Expert Claim Construction Reports	July 26, 2013
7	Initial Motions to Dismiss	July 31, 2013
8	Rebuttal Expert Claim Construction Reports	August 9, 2013
9	Completion of Expert Discovery	August 23, 2013
10	Final Claim Construction	August 30, 2013
11	Opening Claim Construction Briefs	September 13, 2013
12	Responsive Claim Construction Briefs	October 14, 2013
13	Joint Claim Construction and Prehearing	October 21, 2013

No.	Description	Deadline
	Statement	
14	Claim Construction Hearing (CCR)	November 15, 2013 at 9:00 AM
15	Production of Written Advice of Counsel	At least 90 days prior to the close of fact discovery
16	Court's Claim Construction Ruling (CCCR)	TBD
17	Final Infringement Contentions	Within 14 days after the CCCR is issued
18	Final Non-Infringement Contentions, Final Invalidity and Unenforceability Contentions	Within 30 days after the CCCR is issued
19	Close of Fact Discovery	No later than 30 days after CCCR
20	Status Conference	Within 30 days after the CCCR is issued
21	Final Validity and Enforceability Contentions	Within 45 days after the CCCR is issued
22	Initial Expert Witness Disclosures	Within 60 days after the CCCR is issued
23	Rebuttal Expert Witness Disclosures	Within 30 days service of Initial Expert Witness Disclosures
24	Rule 26(e) Supplementation	20 days before close of expert discovery
25	Completion of Expert Depositions	Within 40 days after service of Expert Rebuttal Disclosures
26	Filing Dispositive Motions	Within 14 days after end of expert discovery
27	Final Lists of Witnesses and Exhibits Under Rule 26(a)(3)	June 4, 2014
28	Objections to Final Lists of Witnesses and Exhibits	June 18, 2014
29	Joint Pretrial Order	July 18, 2014
30	Pretrial Conference	July 25, 2014
31	Trial	August 4, 2014 at 9:30 AM

A proposed order granting this joint motion for entry of a scheduling order is being submitted in Microsoft Word format via electronic mail to the Court.

Dated: June 21, 2013

Respectfully submitted,

s/James R. Michels

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup> day of June, 2013, a copy of the foregoing was filed through the Court's CM/ECF system. Parties may access this filing through the Court's system. Notice of this filing will be sent to the following parties as indicated on the electronic filing receipt:

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